

EVALUATION REPORT

Unocal #4935
Facility ID#111432
Application #402328
2200 Mendocino Ave, Santa Rosa, CA 95401

BACKGROUND

Unocal #4935 has submitted this application to increase the permitted gasoline throughput from 3.3 million gallons per year to 17.54 million gallons per year.

This station is within 1,000 feet of Salvador Elementary School and the project increases permitted emissions. Thus, the projects trigger the Public Notice requirements under California Health & Safety Code and District's Regulation 2-1-412.

This application will not result in changes to the current configuration of the facility. The facility is currently equipped with Phase I OPW EVR system, Phase II VST Balance EVR system with Veeder Root Vapor Polisher and Veeder-Root ISD, 12 triple product gasoline nozzles and 2 diesel nozzles.

A Health Risk Screening Analysis (HRSA) was performed for this application indicates that an increase to 17.54 million-gallons per year throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to 17.54 million gallons per year.

Before this project can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above schools and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be paid by the applicant.

EMISSION CALCULATIONS

Emission factors are taken from the Gasoline Service Station Industry-wide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 17.54 million gal per year is based on the results of the Air Toxics Risk Screening.

Table 1 - Emissions Calculation

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	0.670	32.20	11751.8	5.876
Benzene	0.00369	0.177	64.73	0.032

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

This station is permitted to emit more than 10 pounds of VOC in a single day. Thus the Best Available Control Technology (BACT) requirement of Regulation 2-2-301 is triggered.

BACT for Gasoline Dispensing Facilities (GDFs) is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment.

Unocal #4935 will meet this through the use of OPW EVR Phase I equipment and VST Balance EVR Phase II equipment with Veeder Root Vapor Polisher and Veeder-Root ISD system. The two systems are certified by CARB under Executive Orders VR-102 and VR-204 respectively.

BEST AVAILABLE CONTROL TECHNOLOGY FOR TOXICS (TBACT)

The expected increased health risk from this project exceeds 1 per million, triggering the use of TBACT equipment. TBACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment.

Unocal #4935 will meet this through the use of OPW EVR Phase I equipment and VST Balance EVR Phase II equipment with Veeder Root Vapor Polisher and Veeder-Root ISD system. The two systems are certified by CARB under Executive Orders VR-102 and VR-204 respectively.

HEALTH RISK SCREENING ANALYSIS (HRSA)

An HRSA was required since the increased benzene emissions exceed the toxic air contaminant risk triggering level specified in Regulation 2-5 table 2-5-1. For a GDF that meets the TBACT requirement, it must also pass the toxic risk screening level of less than 10 in a million. The facility meets the risk standards with 17.54 million gallons of annual throughput.

PUBLIC NOTIFICATION

This station is within 1,000 feet of K-12 schools and the project increases permitted emissions. Thus, the projects trigger the Public Notice requirements under California Health & Safety Code and District's Regulation 2-1-412. Before this project can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above schools and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be paid by the applicant.

School within ¼ mile:

Nueva Vista High School/ Lewis Opportunity School
2230 Lomitas Ave
Santa Rosa, CA 95404

Steele Lane Elementary School
301 Steele Lane
Santa Rosa, CA 95403

COMPLIANCE

The facility shall comply with the District's Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101 and VR-204. The facility is required to perform source test on the Phase I and Phase II device in accordance to the CARB Executive Orders.

Offsets, Regulation 2-2-302: Because the total facility emissions will be less than 15 tons per year, the facility is not required to provide offsets.

California Environmental Quality ACT (CEQA), Regulation 2-1-311: This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3 and therefore is not discretionary as defined by CEQA.

RECOMMENDATION

The District has reviewed the material contained in the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of District, state and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed source will be located within 1000 feet of a school which triggers the public notification requirements of District Regulation 2-1-412.6. After the comments are received and reviewed, the District will make a final determination on the permit.

I recommend that the District initiate a public notice and consider any comments received prior to taking any final action on issuance of an Authority to Construct for the following facility:

S-1 Unocal #4935, Gasoline Dispensing Facility, 17.54MM Gallon/yr

Scott Owen
Supervising Air Quality Engineer
Engineering Division

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